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Kate Brown, Governor

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November 10, 2015 Electronic Delivery

Jack Spicuzza
Univar USA Inc.
9370 Pratolino Villa Dr
Dublin, OH 43016

Re: DEQ comments on Draft Stormwater Source Control Evaluation Work Plan – Univar USA, Inc.
ECSI # 330

Dear Jack:

Thank you for your submittal of the draft work plan for evaluating the stormwater pathway, including the potential for groundwater infiltrating the storm lines, at the site. DEQ reviewed the plan and also solicited comments from the City of Portland, since site stormwater discharges to the City outfall basin 18 conveyance system. DEQ's comments to improve the work plan are offered below and include integration or reference to City comments that DEQ agrees should be addressed in a revised submittal. The full comment set offered by the City is also attached for your further consideration. DEQ requests that you prepare a revised work plan submittal that addresses pertinent comments.

General Comments

The work plan is well written and addresses most of DEQ's and the City's previous comments on stormwater investigation work completed prior to execution of our letter agreement in July 2015. DEQ appreciates the effort taken to determine the origin and flow paths of the many laterals along the eastern margin of the property. With your permission, DEQ will use the final figures from the approved work plan to discuss unaddressed catch basins and laterals on the adjacent property.

Specific Comments

1. Section 2.3.3 – The last paragraph of this section indicates that approximately 12 inches of accumulated sediment in the City 42-inch line at the sag where removed. Please provide any available information on volume and characterization of this removed material, either for source control purposes or for disposal, and consider it in the source control evaluation.

2. Section 2.4 - Please expand the sub-basin drainage area description to include site drainage basin 5 discharging to the City's west-central subbasin, as described in City comment #12.

3. Section 2.4.1 and Figures 3 and 4 – Please resolve discrepancies between the text and figures as described in City comment #13.

4. Section 2.4.2.1 – The paragraphs summarizing source control status at adjacent sites mischaracterizes information presented in DEQ's Portland Harbor Upland Source Control Summary Report. As written, the summaries imply that DEQ changed the priority for source control of sites based on implementation of source control actions completed at sites. In actuality, priorities were assigned relative to known information at the outset of DEQ's source control work, in order to help DEQ plan workload and ensure that the sites with the most threat of contaminant migration to the river were addressed in a timely fashion. The tables summarizing site activities in DEQ's Summary Report include a column that indicates DEQ's qualitative assessment of each sites potential for sediment recontamination following implementation of EPA's in-water cleanup. This ranking of potential for sediment recontamination can change, relative to implementation of effective source control actions at each site. Please revise the write-up of source control status at adjacent sites to reflect this nuance.

5. Section 2.4.3.7 – As noted in Section 2.3.2, historical NPDES 1200Z Industrial Stormwater general permit monitoring data includes concentrations of copper, lead, zinc and total suspended solids that are very elevated, with regard to Portland Harbor screening level values and DEQ's rank-order curves of data collected at heavy industrial sites within the Portland Harbor study area uplands. These metals and other contaminants of interest at the site, are often associated with solids, such that a focus on reducing accumulation of solids in the stormwater system is often an effective source control measure.

    a. It is unclear if regular site sweeping is accomplished at the site, which DEQ recommends as an effective solids accumulation reduction practice. Please clarify if biannual "ground sweeps" in "industrial active areas" refers to a visual inspection or a sweeping program. If sweeping, please provide information on extent of areas addressed, equipment used and actual frequency by which sweeping has occurred over recent years.
    b. Regular catch basin cleaning is included as a current practice. If available, please provide information on frequency and volumes and character of material removed or begin logging this information through regular operations such that it can be used to determine effectiveness of source control actions.

6. Section 3.4 – At least initially, the list of contaminants investigated at the site should also include those found elevated in the sediment area of potential concern where site stormwater discharges to the river. Site discharges enter the river through City outfall 18, which discharges to AOPC 19, which has elevated concentrations of: aluminum, barium, cadmium, copper, iron, manganese, mercury, silver, zinc, bis(2-ethylhexyl)phthalate, PCBs, PAHs, dioxins/furans, aldrin, delta-HCCH, dieldrin, endrin, DDx, chloroethane. This should be noted in the work plan and subsequent source control evaluation report and used as a line of evidence.

7. Tables 4, 5 & 6 – Please revise these tables to include the additional contaminants and clarifications requested below:

    a. Table 4 – The categories of contaminants are inconsistent with those in Tables 5 & 6. The SVOC category in Tables 5 & 6 includes subcategories of phthalate esters and PAHs, but in Table 4, PAHs are called out separately.
        i. DEQ suggests using all subcategory groups in Table 4.

   ii. Add organochlorine pesticides to Table 4.
   iii. Roof 1 & 2 should also include phthalates.
b. Table 5 - Please include aluminum, barium, iron, silver and DDx.
c. Table 6 – Please include aluminum, barium, iron, silver and TSS.
d. Please specify analytical methods to be used by the laboratory that are better able to achieve method detection limits comparable to Portland Harbor screening level values, as indicated in City comment #8.
e. Please instruct the laboratory to perform proper sample cleanup procedures, in the event of matrix interferences, before resorting to dilution of samples for analysis.

8. Section 4.1 – DEQ appreciates the effort to select catch basins for sampling based on representativeness of operations and location within the drainage subbasins. Rather than selecting a different catch basin to sample, in the event that adequate sediment has not accumulated, please consider compositing available sediment from the selected catch basin with those radiating out from it within the same drainage subbasin.

9. Section 4.2 and Figure 5 – Please consider adding an additional sampling point in site drainage basin 2 and moving the point noted in site drainage basin 5, as described in City comment #15.

10. Section 4.3 – DEQ agrees with the City's comments #2, 3, and 4, which point out that the focus of the potential for contaminated groundwater to be preferentially transported in or along stormwater lines is too narrow. Please revise this section to include development and evaluation of additional information on: seasonal high groundwater elevations in relation to elevations of all piping that could preferentially transport groundwater (the 42-inch City line, site laterals, and the downgradient ODOT line); groundwater gradient and contaminant concentrations in the plume in relation to intersection with any of these lines; additional observations of potential dry-weather flow in yet unobserved lines with appropriate seasonal timing considerations; and additional seasonally relevant sampling at point(s), as warranted by the observations.

11. Section 5.1 – DEQ agrees with City comment #16 that clarification on where catch basin solids are collected from is needed. For source tracing purposes, samples collected from above the filter are preferable and can include material collected from below the filter in the event adequate material for analysis is needed. For catch basin filter effectiveness, sample collection from material below the filter is preferable. DEQ recommends that initial samples be collected for source tracing purposes and that effectiveness sampling be conducted, as needed, following the investigation and subsequent implementation of any necessary source control measures.

12. Sections 7.1 and 8.0 – Please adjust the sampling procedures, schedule and phasing of tasks, as warranted, in light of the additional observations and seasonal considerations requested in DEQ comment 10 above.

Thank you for considering and integrating these comments into a revised work plan. Please let me know if you would like to discuss the comments further or have questions on the process. You can reach me at liverman.alex@deq.state.or.us or 503-229-5080. Per the terms of our letter agreement, please prepare your revisions for submittal within 30 days of receipt of this letter, or by December 10, 2015.

Sincerely,

L. Alexandra Liverman
Portland Harbor Stormwater Coordinator

Attachment: City of Portland comments on Univar Stormwater Source Control Work Plan

ec: Brendan Robinson, ERM
Linda Scheffler, City of Portland
Eva DeMaria, EPA